

### Davis Wright Tremaine LLP

BELLEVUE

LOS ANGELES NEW YORK

PORTLAND

SAN FRANCISCO

SEATTLE

SHANGHAI

WASHINGTON, D.C.

THERESA Z. CAVANAUGH DIRECT (202) 973-4257 terrycavanaugh@dwt.com

SUITE 200 1919 PENNSYLVANIA AVENUE, N.W. FAX (202) 973-4499

TEL (202) 973-4200

WASHINGTON, D.C. 20006-3402 www.dwt.com

January 15, 2009

#### Via ECFS

ANCHORAGE

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re:

Centennial Communications Corp.

Status of Compliance with the Commission's

Hearing Aid Compatibility Requirements - WT Docket No. 07-250

Dear Ms. Dortch:

Centennial Communications Corp. ("Centennial"), by its attorneys and pursuant to the Federal Communications Commission's ("FCC" or "Commission") Order in this matter<sup>1</sup>, hereby submits its Hearing Aid Compatibility ("HAC") Report. Because Centennial provides CMRS service both in and outside of the continental United States via two separate systems, Centennial is submitting two reports detailing its HAC compliance. The first report covers Centennial's operations in Puerto Rico and the U.S. Virgin Islands, and the second report covers HAC compliance in Centennial's domestic markets.

Should you have any questions or need further information, please contact the undersigned.

Very truly yours,

cc:

Weiren Wang (via e-mail)

Best Copy and Printing, Inc. (via e-mail)

Amendment of the Commission's Rules Governing Hearing Aid-Compatible Telephones, First Report and Order, WT Docket No. 07-250, FCC 08-68 (February 28, 2008) ("Order")

## **Voluntary Form for Hearing Aid Compatibility Status Report**

Reporting Period (MM/DD/YY) <u>7/1/2008</u> to (MM/DD/YY) <u>12/31/2008</u>

Section 1. Company Information	Service Provider X	Device Manufacturer
Company Name: Centennial Communications C	orp. (Puerto Rico System)	
Company Address: 1919 Pennsylvania Avenue, 1	NW, Suite 200	
City: Washington	State: DC	Zip Code: 20006
Phone: 202-973-4311	Fax: 202-973-4499	E-mail: broughton@centennialcorp.com
Filing Agent / Law Firm: Davis Wright Tremain	ne LLP	
Filing Agent Contact Name: Theresa Z. Cavanau	gh	
Filing Agent Address: 1919 Pennsylvania Avenu	e, NW, Suite 200	
City: Washington	State: DC	Zip Code: 20006
Phone: 202-973-4200	Fax: 202-973-4499	E-mail: terrycavanaugh@dwt.com

Section 2 - Acoustic and Inductive Coupling- Compatible Handset Models - Rated @ Least M3 & T3

	Model		Starting	Ending			M-	T-		Functionality
Handset Maker	Name	FCC ID(s)	Available	Available	CDMA	Bands	Rating	Rating	Wi-Fi	Level
Motorola	K1m	IHDT56GH1	Nov-06	Dec-08	CDMA	1900	M4	T4	No	Basic
Utstarcomm	W385	IHDT56HC1	Oct-07	Dec-08	CDMA	1900	M4	T4	No	Basic
Nokia	2135	QMNRH-108	Jun-07	Dec-08	CDMA	1900	M3	T4	No	Basic
Kyocera	K132	OVFKWC-K27	Mar-08	Dec-08	CDMA	1900	M3	T4	No	Basic
Motorola	V3m	IHDT56FT1	Jan-07	Dec-08	CDMA	1900	M4	T4	No	Enhanced
Motorola	V9m	IHDT56HT1	Nov-07	Dec-08	CDMA	1900	M4	T4	No	Enhanced
Kyocera	E2000	OVFK60-E2-5G5	Jun-08	Dec-08	CDMA	1900	M4	T4	No	Enhanced
Blackberry	8830	L6ARBK40CG	Dec-07	Dec-08	CDMA	1900	M4	T4	No	Premium
Blackberry	8330	L6ARBU20CW	Aug-08	Dec-08	CDMA	1900	M4	T4	No	Premium
Palm	755p	O8F-895	Jan-08	Dec-08	CDMA	1900	M3	T4	No	Premium

Section 3 - Acoustic Coupling Compatible Handset Models Rated @ Least M3 Not T3

- canana		Model		Starting	Ending			M-	T-		Functionality
	Handset Maker	Name	FCC ID(s)	Available	Available	CDMA	Bands	Rating	Rating	Wi-Fi	Level
	UTStarcomm	8935	PP4L1	Sep-07	Dec-08	CDMA	1900	M4	N/a	No	Basic
	Kyocera	k312	OVFKWC-K24-2J0	Mar-08	Dec-08	CDMA	1900	M4	N/a	No	Basic
	UTStarcomm	8960	PP4OVAL	Mar-08	Dec-08	CDMA	1900	M4	N/a	No	Enhanced
	Motorola	Z6m	IHDT56GU1	Nov-07	Dec-08	CDMA	1900	M4	N/a	No	Enhanced
	Palm	700w	O8FJIMI	Feb-07	Dec-08	CDMA	1900	M3	N/a	No	Premium
	Lgic	830	BEJAX830	Nov-08	Dec-08	CDMA	1900	M3	N/a	No	Premium
	Motorola	Q9c	IHDT56HS1	Jul-08	Dec-08	CDMA	1900	M3	N/a	No	Premium

Section	on 4. Non	-Hearing	Aid-Com	patible Ha	ndset Mod	lels (Rated N	leither M3 N	or T3)		
Index	Handset Maker	Model Name(s)	FCC ID(s)	Starting Available Date (MM/YY)	Ending Available Date (MM/YY)	Air Interface Technology (GSM,CDM A, WCDMA, etc)	Operating Frequency (700, 800, 1900, 2100, etc)	Wi-Fi Interface (Yes / No)	Functionali ty Level (service provider only)	Remark
4-1	Kyocera	K323	OVFKWC- K24	1/07	12/08	CDMA	1900	No	Basic	
4-2	Kyocera	K612	OVFKWC- KX21	3/08	12/08	CDMA	1900	No	Basic	
4-3										
4-4										
more										

Section 5. Total Acoustic and Inductive Cou	pling-Compatible, Acc	oustic Coupling	-Compatible,	and Non-
<b>Hearing Aid-Compatible Handset Models F</b>	By Air Interface Techno	ology		
Air Interface Technology (GSM,CDMA,WCDMA, etc)	Number of Fully Hearing Aid-Compatible Handset Models	Number of Acoustic Coupling- Compatible Handset Models	Number of Non-Hearing Aid- Compatible Handset Models	Remark
CDMA	10	7	2	

Section 7. Product Labeling Information:
Do all hearing aid-compatible handsets include labeling?
Yes X No No
If no, please explain.
Do all hearing aid-compatible handsets with the Wi-Fi air interface have clear and effective disclosure that the handset has not been tested for hearing aid compatibility with respect to its Wi-Fi voice operation?
Yes No X
If no, please explain. Centennial does not offer HAC handsets with the Wi-Fi air interface in its Caribbean system.
Section 8. Public Website:
Does your company maintain a public website describing all hearing aid-compatible models, the ratings of those models, and an explanation of the rating system?
Yes X No No
If yes, please provide the address for the public website. <a href="http://www.centennialpr.com/web/wireless/phones.asp">http://www.centennialpr.com/web/wireless/phones.asp</a>

#### Section 9. Describe Consumer Outreach Efforts in the Past Six Months:

In addition to the new HAC information that Centennial now provides on its website (see Section 8 above), Centennial has been identifying on its website the specific handsets offered that are hearing-aid compatible. Centennial sales and customer representatives have been made aware of the HAC requirements and trained to assist existing and potential customers in identifying HAC handsets offered by Centennial. Further, each HAC handset available in stores is identified with a special HAC label, and HAC is described within the accompanying promotional brochure material. Within Centennial stores, signs are posted highlightinh the availability of HAC handsets.

## Section 10. (Service Providers Only) Describe the Levels of Functionality into Which the Compliant Handsets Fall and Provide An Explanation of the Service Provider's Methodology for Determining Levels of Functionality:

Centennial divides its handsets into three levels of functionality: Basic, Enhanced and Premium. Handsets are categorized based on two criteria – pricing and features offered. The characteristics of each level are described below:

Basic – Handsets in this category have price points up to \$150. Features offered on handsets in this category are simple handsets with no cameras to a handset with a VGA camera; Bluetooth and speakerphone options. From a design perspective, Basic handsets can be a bar or flip-phone.

Enhanced – Handsets in this category have price points from \$150 to \$300. Features offered on Enhanced handsets include cameras with 1 to 1.3 mega pixels; Bluetooth; EVDO; MP3 capability.

Premium - Handsets in this category include any handset exceeding \$300. Features offered on Premium handsets include camera
phones with at least 1.3 mega pixels and/or video capability; Stereo Bluetooth; touch screens; EVDO; MP3, personal organizers.

### **Voluntary Form for Hearing Aid Compatibility Status Report**

Reporting Period (MM/DD/YY) <u>7/1/2008</u> to (MM/DD/YY) <u>12/31/2008</u>

Section 1. Company Information	Service Provider X	Device Manufacturer
Company Name: Centennial Communications C	orp. (Domestic U.S. Operations)	
Company Address: 1919 Pennsylvania Avenue, N	NW, Suite 200	
City: Washington	State: DC	Zip Code: 20006
Phone: 202-973-4311	Fax: 202-973-4499	E-mail: broughton@centennialcorp.com
Filing Agent / Law Firm: Davis Wright Tremain	ne LLP	
Filing Agent Contact Name: Theresa Z. Cavanau	gh	
Filing Agent Address: 1919 Pennsylvania Avenu	e, NW, Suite 200	
City: Washington	State: DC	Zip Code: 20006
Phone: 202-973-4200	Fax: 202-973-4499	E-mail: terrycavanaugh@dwt.com

Handset Maker	Model Name	FCC ID(s)	Starting Available	Ending Available	GSM	Bands	M-Rating	T-Rating	Wi-Fi	Functionality Level	Remark
	Blackberry						1				
RIM	8310	L6ARBN40GW	6/1/2008	12/31/2008	GSM	1850/1900	М3	T3	No	Enhanced	
Motorola	MotoRazr2 V8	IHDT56HZ1	6/1/2008	12/31/2008	GSM	1850/1900	М3	Т3	No	Enhanced	
Motorola	Razr V3E	IHDT56GL1	6/1/2008	12/31/2008	GSM	1850/1900	М3	Т3	No	Basic	
Motorola	Razr V3i	IHDT56GW1	6/1/2008	12/31/2008	GSM	1850/1900	М3	Т3	No	Basic	
Nokia	6085	LJPRM-260	6/1/2008	12/31/2008	GSM	1850/1900	М3	Т3	No	Basic	
Sony Ericsson	W580i	PY7A1052042	6/1/2008	12/31/2008	GSM	1850/1900	М3	Т3	No	Enhanced	
Motorola	W510	IHDT56HB1	9/1/2008	12/31/2008	GSM	1850/1900	М3	Т3	No	Enhanced	
Motorola	W230	IHDP56HK1	9/1/2008	12/31/2008	GSM	1850/1900	M3	Т3	No	Basic	
Nokia	2760	QTLRM-259	6/1/2008	12/31/2008	GSM	1850/1900	М3	T3	NO	Basic	

Handset Maker	Model Name	FCC ID(s)	Starting Available	Ending Available	GSM	Bands	M-Rating	T-Pating	Wi-Ei	Functionality	Remark
nanuset waker	Widdel Name	rec ib(s)	Available	Available	GSIVI	Danus	IVI-IVACING	1-Kating	*****	LEVEI	Kernark
Sony Ericsson	Z310	PY7A1032021	1-Jun	12/31/2008	GSM	1850/1900	М3	n/a	N	Basic	
Nokia	6061	QTLRH-74	6/1/2008	12/31/2008	GSM	1850/1900	М3	n/a	N	Basic	
Nokia	3610	gmnrm-429	10/1/2008	12/31/2008	GSM	1850/1900	МЗ	n/a	N	Basic	

Section4. No	n-Hearing Aid-Co	mpatible Handse	CONTRACTOR OF THE PROPERTY OF		I3 Nor	T3)					
Handset Maker	Model Name	FCC ID(s)	Starting Available	Ending Available	GSM	Bands	M-Rating	T-Rating	Wi-Fi	Functionality Level	Remark
,		PYARM-357									
Nokia	E71	PYARM-346 »	7/1/2008	12/31/2008	GSM	1850/1900	N/A	N/A		Enhanced	
нтс	Touch DUAL	NM8NEON300	8/15/2008	12/31/2008	GSM	1850/1900	N/A	N/A		Enhanced	
нтс	Diamond	NM8DIAM500	9/1/2008	12/31/2008	GSM	1850/1900	N/A	N/A		Enhanced	
нтс	S621	NM8EXCA	6/1/2008	12/31/2008	GSM	1850/1900	N/A	N/A		Enhanced	
Research In											
Motion	8100 - Pearl	L6ARBE40GW	6/1/2008	12/31/2008	GSM	1850/1900	N/A	N/A		Enhanced	
Research In Motion	8110 - Pearl	L6ARBQ40GW	12/15/2008	12/31/2008	GSM	1850/1900	N/A	N/A		Enhanced	
нтс	TyTN II (Kaiser)	NM8KS	9/15/2008	12/31/2008	GSM	1850/1900	N/A	N/A		Enhanced	
Pantech	Duo (C810)	JYCC810	10/15/2008	12/31/2008	GSM	1850/1900	N/A	N/A		Enhanced	
Nokia	5310	PPIRM-304	6/1/2008	12/31/2008	GSM	1850/1900	N/A	N/A		Enhanced	
Sony/Eric	W380	PY7A103251	6/1/2008	12/31/2008	GSM	1850/1900	N/A	N/A		Enhanced	
Nokia	6300	PPIRM-323	6/1/2008	12/31/2008	GSM	1850/1900	N/A	N/A		Basic	
Sony/Eric	K550 - BL	PY7A1052023	6/1/2008	12/31/2008	GSM	1850/1900	N/A	N/A		Basic	
Nokia	N76	OW3RM-149 »	6/1/2008	12/31/2008	GSM	1850/1900	N/A	N/A		Enhanced	
Nokia	N95	PDNRM-245 »	6/1/2008	12/31/2008	GSM	1850/1900	N/A	N/A		Enhanced	
Motorola	Rokr - Z6	IHDP56HH1	6/1/2008	12/31/2008	GSM	1850/1900	N/A	N/A		Basic	
Motorola	Razr 2 V8	IHDT56HZ2 »	6/1/2008	12/31/2008	GSM	1850/1900	N/A	N/A		Enhanced	

Section4. No	on-Hearing Aid-Co	mpatible Handset	Models (Rat	ed Neither M	3 Nor	T3) (Continu	ued)			10 x 11
Motorola	Rokr U9	IHDT56HU1	8/1/2008	12/31/2008	GSM	1850/1900	N/A	N/A	Enhanced	
Nokia	3600 Slider	PPIRM-352	11/15/2008	12/31/2008	GSM	1850/1900	N/A	N/A	Enhanced	
SAMSUNG	t629 Slider	A3LSGHT629	11/1/2008	12/31/2008	GSM	1850/1900	N/A	N/A	Basic	,
Samsung	a436	A3LSGHA437	8/1/2008	12/31/2008	GSM	1850/1900	N/A	N/A	Basic	
Samsung	c416	A3LSGHC417	6/1/2008	12/31/2008	GSM	1850/1900	N/A	N/A	Basic	
Samsung	T509	A3LSGHT509	6/1/2008	12/31/2008	GSM	1850/1900	N/A	N/A	Basic	
Nokia	2680 Slider	QTLRM-393	11/15/2008	12/31/2008	GSM	1850/1900	N/A	N/A	Basic	
Samsung	A226	A3LSGHA227	6/1/2008	12/31/2008	GSM	1850/1900	N/A	N/A	Basic	
Doro	HandleEasy 330	WTCDORO330G SM	11/15/2008	12/31/2008	GSM	1850/1900	N/A	N/A	Basic	
Nokia	6030	QTLRM-75	6/1/2008	12/31/2008	GSM	1850/1900	N/A	N/A	Basic	
Nokia	2610	QTLRH-87 »	6/1/2008	12/31/2008	GSM	1850/1900	N/A	N/A	Basic	
Motorola	MotoFone	IHDT56GF1	6/1/2008	12/31/2008	GSM	1850/1900	N/A	N/A	Basic	
Motorola	W220 Black	IHDT56GK1	6/1/2008	12/31/2008	GSM	1850/1900	N/A	N/A	Basic	

Section 5. Total Acoustic and Inductive Coupling-Compatible, Acoustic Coupling-Compatible, and Non-					
Hearing Aid-Compatible Handset Models By Air Interface Technology					
Air Interface Technology (GSM,CDMA,WCDMA, etc)	Number of Fully Hearing Aid-Compatible Handset Models	Number of Acoustic Coupling- Compatible Handset Models	Number of Non-Hearing Aid- Compatible Handset Models	Remark	
GSM	9	3	29		

Section 7. Product Labeling Information:				
Do all hearing aid-compatible handsets include labeling?				
Yes X No No				
If no, please explain.				
Do all hearing aid-compatible handsets with the Wi-Fi air interface have clear and effective disclosure that the handset has not been tested for hearing aid compatibility with respect to its Wi-Fi voice operation?				
Yes No X				
If no, please explain. Centennial does not offer HAC handsets with the Wi-Fi air interface in its Domestic U.S. system.				
Section 8. Public Website:				
Does your company maintain a public website describing all hearing aid-compatible models, the ratings of those models, and an explanation of the rating system?				
Yes X No				
If yes, please provide the address for the public website. www.centennialwireless.com/hac handsets.php				
If no, please explain.				

### Section 9. Describe Consumer Outreach Efforts in the Past Six Months:

In addition to the new HAC information that Centennial now provides on its website (see Section 8 above), Centennial has been identifying on its website the specific handsets offered that are hearing-aid compatible. Centennial sales and customer representatives have been made aware of the HAC requirements and trained to assist existing and potential customers in identifying HAC handsets offered by Centennial. Further, each HAC handset available in stores is identified with a special HAC label.

# Section 10. (Service Providers Only) Describe the Levels of Functionality into Which the Compliant Handsets Fall and Provide An Explanation of the Service Provider's Methodology for Determining Levels of Functionality:

Centennial divides its handsets into two levels of functionality: Basic and Enhanced. Handsets are categorized based on two criteria – pricing and features offered. The characteristics of each level are described below:

Basic – Handsets in this category have price points up to \$150. Features offered on handsets in this category are simple handsets with no cameras to a handset with a VGA camera; Bluetooth and speakerphone options. From a design perspective, Basic handsets can be a bar or flip-phone.

Enhanced – Handsets in this category exceed \$150. Features offered on Enhanced handsets may include cameras with up to 2 mega pixels; Bluetooth, MP3 capability, and other features.